

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

KALOMA CARDWELL,

Plaintiff,

v.

DAVIS POLK & WARDELL LLP, THOMAS
REID, JOHN BICK, and DANIEL BRASS,

Defendants.

Case No. 19-cv-10256-GHW

**DEFENDANTS' NOTICE OF
OMNIBUS MOTIONS *IN*
*LIMINE***

Please take notice that defendants Davis Polk & Wardwell LLP, John Bick, Daniel Brass, and Thomas Reid, by and through their undersigned counsel, upon the accompanying Memorandum of Law, will move this Court at the United States Courthouse, 500 Pearl Street, New York, New York, for an Order pursuant to Federal Rules of Evidence 401, 402, 403, 404, 801 and/or 802, for an Order granting Defendants' Omnibus Motions *In Limine*:

MIL 1: To exclude evidence, testimony, or argument relating to the dismissed discrimination claims;

MIL 2: To exclude evidence or argument regarding the alleged retaliatory acts that this court dismissed;

MIL 3: To exclude evidence, testimony, or argument of Plaintiff's good or moral character;

MIL 4: To exclude evidence, testimony, or argument related to other alleged "bad acts" of Defendants;

MIL 5: To exclude Plaintiff's charges filed with the Equal Employment

Opportunity Commission and New York State Division of Human Rights and the EEOC's Right to Sue letter;

MIL 6: To exclude Davis Polk's Answer to Plaintiff's Charge of discrimination in recognition of the Court's prior determination that the Answer was not retaliatory under applicable law;

MIL 7: To exclude evidence, testimony, or argument related to the identities of Davis Polk's clients, matters, or client confidences;

MIL 8: To exclude evidence, testimony, or argument related to Defendants' and defense counsel's post-termination, post-complaint litigation conduct;

MIL 9: To exclude evidence, testimony, or argument related to Defendants' financial status unless and until the jury determines that punitive damages are warranted; and for such other and further relief as the Court may deem just and proper.

In support of their Omnibus Motions *In Limine*, Defendants respectfully direct the Court's attention to the accompanying Memorandum of Law.

Dated: September 15, 2023

Respectfully submitted,

PAUL, WEISS, RIFKIND, WHARTON
& GARRISON LLP

/s/ Susanna M. Buerger

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